

UNITED STATES DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT
SALEM DISTRICT OFFICE

**ENVIRONMENTAL ASSESSMENT AMENDMENT
AND DECISION RATIONALE**

**CROOKED ALDER DENSITY MANAGEMENT PROJECT
ENVIRONMENTAL ASSESSMENT No. OR080-99-02**

I have reviewed the proposal and alternatives for the accomplishment of the *Crooked Alder Density Management Project*, a portion of the Fiscal Year 2000 timber sale program for the Marys Peak Resource Area. The affected environment, proposed action and potential environmental consequences of the timber sale and associated activities are described in the *Running Bear LSR Enhancement Project Environmental Assessment* dated June 28, 1999 and the attached EA amendment. The EA and Finding of No Significant Impact were made available for public review from June 28 to July 28, 1999.

Programmatic documents covering this proposal are the:

Plan Maintenance Documentation: Decision to Delay the Effective date for Surveying 7 "Survey and Manage" and Protection Buffer Species (March 8, 2000)

Salem District Record of Decision and Resource Management Plan (RMP, May, 1995)

Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl (ROD, April, 1994)

Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional Forest Related Species Within the Range of the Northern Spotted Owl (SEIS, February, 1994)

Western Oregon Program-Management of Competing Vegetation Final Environmental Impact Statement (VMFEIS, February 1989) and the Western Oregon Program-Management of Competing Vegetation Record of Decision (August 1992).

The Environmental Assessment (EA) and this FONSI are tiered with the mentioned environmental documents. All of these documents may be reviewed at the Marys Peak Resource Area office.

ENVIRONMENTAL ASSESSMENT AMENDMENT

This document supplements the EA for the *Running Bear LSR Enhancement Project* by describing the changes in proposed action, affected environment, and environmental consequences.

II. ALTERNATIVES INCLUDING THE PROPOSED ACTION

B. Alternative A - Proposed Action

On the Units being implemented (**EA Unit 12, Contract Unit 1**):

Further field measurements and unit traverses refined the unit acreage. **Unit 12** would decrease from 31 to 27 acres due to the exclusion of Riparian Reserves from the proposal. The estimated volume to be removed from the sale for the units implemented would be approximately 567 MBF (thousand board feet) (Reference Attached Map).

3. Road Work

New road construction in this unit would be reduced from 435 feet to 305 feet in length.

F. Project Design Features

3. Water/Riparian

Unit 12 (Crooked Alder, Contract Unit 1)

Riparian Reserves in the unit would be established to the standards for streams and wetlands outlined in the *RMP* on page 10. No-entry riparian reserve boundaries would be to ecological breaks, geologically stable breaks or a minimum of 210 feet for non fish-bearing streams or 420 feet for fish bearing streams.

III. Description of the Affected Environment

D. Botany/Fish/Wildlife (Issue No. 4)

Additional Survey and Manage inventories were completed in accordance with the *Plan Maintenance Documentation: Decision to Delay the Effective date for Surveying 7 "Survey and Manage" and Protection Buffer Species* (March 8, 2000). A Supplemental Information Report (SIR) was completed on May 22, 2000 and is incorporated by reference as part of this amendment (see attached SIR).

A Biological Opinion (BO) from National Marine Fisheries Service (NMFS) was received on July 29, 1999 and concluded that the *Running Bear LSR Enhancement Project* along with other projects analyzed in that BO, was "...not likely to jeopardize the continued existence of the Oregon Coast coho salmon" (p. 4). It went on to state that "...The NMFS concurs that

implementation of the subject actions will not result in the destruction or adverse modification of proposed critical habitat for Oregon Coast coho salmon.”

Another Biological Assessment (BA) was submitted on April 17, 2000 for the re-designed Crooked Alder Density Management Project because of the exclusion of Riparian Reserves from the proposed project. The BA concluded that the re-designed thinning would be considered a “may affect, not likely to adversely affect Oregon Coast coho salmon”. No additional terms and conditions would be required for this proposal.

Verbal concurrence was received from NMFS on May 30, 2000 with no additional terms and conditions required other than the current project design. The written “Letter of Concurrence” is currently being prepared, with a signed copy expected by June 2, 2000.

V. Consultation

The EA was mailed to approximately 34 agencies, individuals, tribes, municipal water providers and organizations on June 28, 1999. A legal notice was placed in the Corvallis Gazette Times soliciting public input on the action from June 28 to July 28, 1999. Two comment letters were received. One letter was from an individual wanting to be placed on the bidders list. The other letter was from an environmental organization. The following summarizes the substantive comments raised in that letter, and then responds where appropriate:

Oregon Natural Resources Council, et. al

Water Quality

- a) *The EA lacks water quality information, and sedimentation and baseline measurements necessary to analyze the effects of the proposed project.*
- b) *The EA does not comply with the Aquatic Conservation Strategy Objectives.*

The interdisciplinary team (IDT), including specialists in soils, hydrology, riparian ecology, and fisheries, helped design the proposal to ensure its conformance with ACS objectives. Compliance with those objectives are summarized in the FONSI (p. iv), the EA (pp. 30 to 33) and a thorough analysis of the ACSO’s in Appendix C of the EA.

All of the alternatives proposed in the Crooked Alder Density Management Project as well as the Running Bear LSR Enhancement Project were designed to meet or exceed water quality standards as specified in the Clean Water Act of 1972 (amended 1977 and 1987) as administered by the Oregon Department of Environmental Quality. The alternatives were designed in accordance with the Best Management Practices (BMPs) which are outlined in Appendix C of the Salem District RMP. These BMP’s for the maintenance of water quality in forest management projects were developed utilizing the best available information and research from institutions and universities throughout the Pacific Northwest.

We do have knowledge of historical events that affect watershed condition and the current

assessment by the Oregon Department of Environmental Quality. We use all available information in the estimate of potential environmental effects. However, the lack of specific baseline water quality data in the project area was not considered by the IDT to be necessary to evaluate the potential environmental consequences impact of the proposed action on water quality. There is no requirement that baseline water quality data be gathered on every project, and in fact we do not monitor every single project. Implementation monitoring of projects is completed in accordance with Appendix J of the RMP. Effectiveness monitoring of BMP's on the Salem District are discussed in the *FY 1998 Annual Program Summary and Monitoring Report for the Salem District*. Please call if you wish to obtain a copy or you can find at our web site at <http://www.or.blm.gov/salem/html/planning/98aps.pdf>.

Based on our knowledge of site factors, coupled with familiarity with the relevant research and experience gained through years of forest management actions similar in scope, the project design features and mitigation measures would be more than adequate to protect water quality in this project.

For the Crooked Alder Project, Riparian Reserves in the sale area would be established to the standards for streams and wetlands outlined in the *RMP* on page 10. Riparian Reserve boundaries would be to ecological breaks, geologically stable breaks and a minimum of 210 feet for non fish-bearing and 420 feet for fish bearing streams. Stream identification occurred on the entire Running Bear LSR Enhancement Project area during the period between April and September in accordance with our current Salem District policy, in order to identify annual scour prior to leaf fall in autumn..

Cumulative Impacts

Failure to address cumulative effects adequately.

The project area is located within the North Fork Alsea River watershed; the *North Fork Alsea Watershed Analysis* was completed in July 1996. Cumulative effects to water quality and quantity are addressed on pages 32 to 33 of the EA. As stated there, "...implementation of this proposal would have very little influence over watershed CE (cumulative effects) which would be primarily driven by activities on private lands ...". The analysis recognized short term increases in sedimentation due to log haul, however the overall aquatic habitat would be improved because of the improved long term availability of large woody debris (LWD) in riparian areas. These conclusions were based on review of several sources of information: a) the watershed analysis's findings; b) Oregon Department of Fish and Wildlife Stream surveys; c) field observations; d) historic aerial photos; and e) State of Washington Department of Natural Resource watershed assessment methods.

The Alternatives

a) EA does not present an adequate range of alternatives which would minimize adverse impacts on the environment.

The *Salem District Record of Decision and Resource Management Plan* (RMP; May 1995) established management objectives and direction for achieving healthy forest ecosystems and for providing forest products. The purpose and need for the Running Bear LSR enhancement project as presented in the EA fit well within the range of activities identified in the RMP. Furthermore, the *North Fork Alsea Watershed Analysis* (USDI-BLM 1996) outlined management opportunities, including density management treatments, for restoring and enhancing ecosystem conditions. The *Late-Successional Reserve Assessment, Oregon Coast Province - Southern Portion* (R0267, R0268)(USDA-FS and USDI-BLM 1997) set priorities for treatment of federal lands designated as LSR across the landscape. The proposed project was designed to meet objectives outlined in the above documents.

The range of alternatives considered in an EA is largely dependent on the purpose and need for the project. The range of alternatives for the Running Bear LSR enhancement project was appropriate for the scope of the project. The EA included three alternatives: Alternative A (Proposed Action), Alternative B (same as Alternative A, with helicopter yarding excluded), and Alternative C (No Action). The EA also included “alternatives considered but rejected” which included additional acres to be treated which were eliminated due to steep slopes, excessive road building, and safety issues related to Marys Peak Road.

The proposed action includes helicopter yarding a substantial portion (110 acres) of the treatment area, thus reducing the amount of road construction. The proposed action also requires all road construction to be located on ridge tops and outside Riparian Reserves.

Scoping for this project first began in June 1998 with the distribution of the Bureau of Land Management Salem District’s *Project Update*. There were no suggestions for developing further alternatives based on issues resulting from the scoping process; scoping continued through December 1998. Alternatives for density management treatment, coarse woody debris enhancement, and transportation management were developed appropriately based on scoping and the stated purpose and need.

The alternatives suggested in the comment letter do not fully meet the purpose and need for the project, specifically the need to enhance late-successional forest characteristics (EA p. 3). An alternative excluding all road construction would seriously impede the ability to perform desired density management on a substantial amount of the project area. An alternative exclusively requiring road decommissioning and the introduction of coarse woody debris (CWD) again would not fully meet objectives for enhancing and accelerating late-successional forest ecosystem conditions. As stated on pages 12 and 13 of the EA, a number of acres adjacent to the proposed treatment area were considered for inclusion into the project, however deferred because of various reasons, including stands that would have required the building of too much new

road.. The Running Bear LSR enhancement project interdisciplinary team (IDT) considered a variety of actions related to ecosystem management and concluded that the proposed silvicultural treatment and related actions would achieve the highest rate of success for the enhancement of late successional forest habitat within the project area.

b) There is inadequate depth of analysis of the alternatives.

Environmental consequences for all alternatives were included in the EA. The No Action alternative effects to vegetation, fisheries and wildlife were documented in the EA (p. 47). The no action alternative would logically result in the continuation of current trends and conditions which were described in the affected environment section of the EA. In addition the project file contains reports from resource specialists analyzing the impacts between the alternatives. For instance, the silvicultural prescription contains a stand projection table indicating the average stand diameter would increase, growth of understory shrubs and herbs would be stimulated, and crown ratios and limb development would increase by implementing the proposed action. Larger size trees produce higher quality down logs and snags in the future.

Environmental Impact Statement (SEIS)

An SEIS should be prepared.

The Running Bear LSR enhancement project would not significantly impact the human environment. Further, based on the site-specific environmental analysis documented in the environmental assessment, it is determined that this project is not a major federal action and that it will have no significant effects on the quality of the human environment. Therefore an environmental impact statement will not be prepared (see “Finding of No Significant Impact” signed June 28, 1999). The word “significantly,” as used in planning processes subject to the National Environmental Protection Act (NEPA), requires consideration of context and intensity, and is defined in 40 CFR 1508.27. The criteria which were selected from the definition and used as part of the comments included no supporting information; no additional reason was provided to show the analysis as inadequate. The EA provided sufficient information to make the determination that a new SEIS or supplement to the *Salem District Proposed RMP/Final Environmental Impact Statement* (September 1995) is unnecessary.

Wildlife Species

a) The EA does not thoroughly analyze impacts of the proposed action on wildlife, and it also fails to adequately survey or present management plans for designated Survey and Manage (S & M) species (including red tree voles).

All impacts to wildlife were considered within a Biological Evaluation that is part of the administrative record (contained in the Analysis File and referenced in the EA, p. 38). All pertinent aspects of the affected environment and environmental consequences as discussed within the Biological Evaluation were incorporated within the EA. On March 8, 2000, the State Director signed *Plan Maintenance Documentation: Decision to Delay the Effective date for*

Surveying 7 “Survey and Manage” and Protection Buffer Species, which clarified survey requirements for Survey and Manage Species required in the Salem District Resource Management Plan (RMP).

Given that clarification, additional inventories completed for Survey and Manage species were completed on the *Crooked Alder Density Management Project* area and are documented in the May 5, 2000 Supplemental Information Report (SIR). Since then, the BLM initiated surveys for red tree voles within Unit 12 and found no evidence of red tree vole presence (see SIR). The original EA and the Supplemental Information Report describe impacts to wildlife species adequately, and no additional design features are necessary to protect wildlife resources in accordance with all currently applicable laws and policies.

b) The EA stated that noise from the machinery may disturb the birds (spotted owl and marbled murrelet), yet does not provide mitigation for this problem, and the EA does not comply with management requirement of 100 acres surrounding northern spotted owl activity centers.

The EA stated that concerns for federally listed wildlife species were addressed through formal consultation with the U.S. Fish and Wildlife Service (per Section 7, Endangered Species Act). The resulting Biological Opinion (BO # 98-F-361) from the Service provided for incidental take that may occur to the owl or murrelet as a result of disturbance from the proposed action. The BO also provided mandatory Terms and Conditions to be incorporated into the proposed action in order to mitigate the risk of take. For specifics, please reference applicable Terms and Conditions from the BO that were incorporated into the design features that are outlined on page 16 in the EA. As described in the EA (p. 39), the nearest spotted owl site is in late-seral habitat 0.8 mile away from the project area. None of the 100-acre core area for this owl site will be affected by this proposed action. Since 1994, no new owl sites have been found within close proximity to the Running Bear LSR Enhancement Project area. However, if such sites are discovered they would not be subject to the 100-acre core area designation as described within the Northwest Forest Plan and Salem District RMP (pp. 22 and 32).

c) The EA and Analysis file does not contain information about which species were surveyed for in the planning process of this sale.

The Biological Evaluation (BE) contained within the analysis file includes a discussion (see BE, Attachment A, p. 3) of which species were surveyed for, and those that did not require surveys.

d) Surveys for S & M species must precede design of all ground-disturbing activities, and BLM failed to conduct a survey for red tree voles.

Additional surveys were completed for red tree voles as stated in the SIR. The *Crooked Alder Density Management Project* includes all necessary design features to protect Survey and Manage species based on the results of all required surveys.

e) The EA presents inadequate plans for protection of the habitat for State Listed and Bureau Sensitive species, and formal surveys for Bureau Sensitive species (such as the clouded salamander) were not completed. Bureau Sensitive species and their habitat should be managed so as to recover the species, not further degrade their habitat.

The EA determined that all of the State Listed and Bureau Sensitive species (except those that were also federally listed or are Survey and Manage mollusk species) were not likely to be substantially affected by this action for numerous reasons (as stated on pp. 45 and 46 of the EA). Bureau Sensitive species are not surveyed for where the proposed action is determined not to have a significant affect on their status. Salem RMP (p. 29) states: “As funding permits and as species conservation dictates, bureau sensitive and assessment species will be actively managed.” Clouded salamanders were found outside the current proposed boundary for the Running Bear LSR Enhancement Project area. The treatment regime for the proposed harvest unit includes retention of existing down logs and snags, and creation of new coarse woody debris which will specifically benefit this species. Those BS species that are also federally listed or S & M mollusks were protected and surveyed for in accordance with all BLM policies, the RMP, and Northwest Forest Plan Standards and Guidelines.

f) Surveys must be done for the listed species, and an SEIS is necessary for further analysis of the effects of this sale on the sensitive populations.

The only listed species likely to occur within the action area are the spotted owl and the marbled murrelet. Surveys for spotted owls are not a requirement of the Northwest Forest Plan. However, excellent up-to-date survey information for spotted owls was available and was analyzed for this project area as described in the EA on page 39. Surveys for marbled murrelets are not required when suitable habitat will not be modified; the proposed action and applicable Terms and Conditions resulting from Section 7 Consultation are incorporated into the project design (see EA, pp. 16 and 17). An SEIS is not required when the scope of the proposed action and its anticipated impacts do not exceed those already analyzed within the existing land management plans. The proposed Running Bear LSR Enhancement Project and its alternatives are in conformance with both the Northwest Forest Plan and the Salem District RMP; therefore, an SEIS is not necessary.

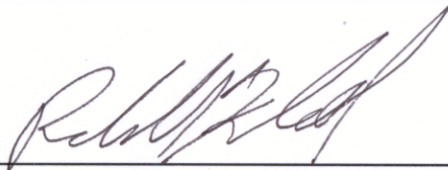
Road Work Impacts

The benefits of hastening late successional forest conditions do not outweigh the impacts road construction and renovation would cause.

The benefits of accelerating late-successional forest characteristics outweigh the short-term impacts caused by 300 feet of new road constructed on a ridge top location and outside Riparian Reserve. Using the Organon growth and yield model, the following information was projected for Unit 12 of the *Running Bear LSR Enhancement Project* (in 45 years)(Reference Silvicultural Prescription):

Crooked Alder	Age	Quadratic Mean Diameter (in inches)	Average Snag/CWD DBH (in inches)
No Treatment	99	25.1	11.8
With Treatment	99	34.5	27.8

Prepared by:



Date:

May 30, 2000

FINDING OF NO SIGNIFICANT IMPACT

Based on the information in the Supplemental Information Report and EA Amendment for the Crooked Alder Density Management Project, it is my determination that the new information does not constitute a significant impact affecting the quality of the human environment greater than those addressed in the :

Plan Maintenance Documentation: Decision to Delay the Effective date for Surveying 7 "Survey and Manage" and Protection Buffer Species (March 8, 2000)

Running Bear LSR Enhancement Project Environmental Assessment (June 28, 1999)

Salem District Record of Decision and Resource Management Plan (RMP, May, 1995)

Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl (ROD, April, 1994)

Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional Forest Related Species Within the Range of the Northern Spotted Owl (SEIS, February 1994)

Western Oregon Program-Management of Competing Vegetation Final Environmental Impact Statement (VMFEIS, February 1989) and the Western Oregon Program-Management of Competing Vegetation Record of Decision (August 1992).

Impacts to the environment would be not significantly more than those disclosed in the original EA. Therefore, a new SEIS or supplement to the existing SEIS is unnecessary and will not be prepared.

Marys Peak Field Manager:

John P. Baerlo

Date: 05-3000

DECISION RATIONALE

My decision is to do the following:

Implement the proposed action as amended on **Unit 12 (Contract Unit 1)**. *Reference attached map*


Implement the **Deferred Harvest** (No Action) alternative on other units analyzed in the *Running Bear LSR Enhancement Project Environmental Assessment* (EA No. OR-080-99-09) until further notice,

A. **Deferring of Units other than Unit 12**

Other Units will be deferred because of the abundance of of Survey and Manage fungi species throughout on some of the deferred units. The species present (*Otidea onotica*). is much more prolific than originally thought and hence may be removed as a category 2 species in the ROD for the SEIS.

F. **Protests**

In accordance with Forest Management Regulations at 43 CFR 5003.2, the decision for this timber sale will not become effective or be open to formal protest until the Notice of Sale is published "in a newspaper of general circulation in the area where the lands affected by the decision are located." Protests of the sale must be filed within 15 days of the first publication of the notice. For this project, the Notice of Sale will be first published in a newspaper of general circulation on or before June 2, 2000. The planned sale date is June 28, 2000.



John Bacho
Marys Peak Field Manager

05-30-00

Date

United States Department of the Interior
BUREAU OF LAND MANAGEMENT

Tract No. 00-306
Crooked Alder
Density Management

TIMBER SALE MAP

T. 13 S. R. 7 W., W. M. - SALEM DISTRICT - OREGON

EXHIBIT A



LEGEND

	Existing road		Partial Cut Area
	Road to be constructed		Ground Based Yarding
	Streams		Special Yarding
	Power Line		Reserve
	Boundary - cutting area		
	Boundary - contract area		

Boundary of partial cut area adjacent to timber reserve is posted and painted orange. Right-of-way limit is posted and painted orange.

NOTE: Boundary of partial cut area adjacent to existing road and powerline is not posted and painted.



Scale: 1" = 1,000'